

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
NEW YORK**

COR DEVELOPMENT COMPANY, LLC,

Plaintiff,

v.

TODD R. HOWE,

Defendant.

Civil Action No. 00-99999

**EXHIBIT A TO
NOTICE OF REMOVAL**

STATE OF NEW YORK
SUPREME COURT **COUNTY OF ONONDAGA**

COR DEVELOPMENT COMPANY, LLC,

SUMMONS

Plaintiff,

Index No.:
RJI No.:

1

TODD R. HOWE.

Date Filed:

Defendant.

Plaintiff designates Onondaga
County as the place for trial.

'The basis for venue is that Plaintiff's principal office is in Onondaga County and located at 540 Towne Drive, Fayetteville, New York 13066

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's attorneys within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if the Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: August 8, 2016

Defendant's Address:
4107 Fordham Road NW
Washington, D.C. 20016

Anthony F. Copani
Anthony F. Copani, Esq.
MANNION & COPANI
Attorneys for Plaintiff
306 Syracuse Building
224 Harrison Street
Syracuse, New York 13202
Telephone: (315) 478-3500

STATE OF NEW YORK
SUPREME COURT **COUNTY OF ONONDAGA**

COR DEVELOPMENT COMPANY, LLC,

Plaintiff,

COMPLAINT

v.

TODD R. HOWE,

Index No.:

RJI No.:

Defendant.

Plaintiff, COR Development Company, LLC, by and through its attorneys, Mannion & Copani, as and for its Complaint against Defendant Todd R. Howe, hereby states as follows:

1. At all times hereinafter mentioned, Plaintiff, COR Development Company, LLC (“COR”) is a limited liability company duly organized under the laws of the State of New York with a principal place of business in the County of Onondaga.
2. Upon information and belief, and at all times hereinafter mentioned, Defendant Todd R. Howe (“Defendant”) is an individual residing at 4107 Fordham Road NW, Washington, District of Columbia 20016.
3. Defendant on or about August 14, 2015, executed and delivered to COR a promissory note whereby Defendant promised to pay COR on December 31, 2015, the sum of eighty-five thousand dollars (\$85,000.00) with interest thereon at the rate of one percent (1%) per annum.
4. COR and Defendant on or about January 25, 2016 amended the promissory note to extended the maturity date of the promissory note from December 31, 2015 to June 30, 2016.
5. The promissory note further provided that Defendant was obligated to pay COR

late charges in an amount equal to three percent (3%) of "any payments not made under (the promissory note) within fifteen (15) days of the due date"

6. Pursuant to the terms of the promissory note, COR is also entitled to its costs and attorney's fees incurred in the collection of all amounts owed by Defendant.

7. Defendant has failed to make any payments due under the promissory note.

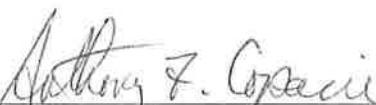
8. Defendant owes to COR the amount of the promissory note, plus interest, late fees, COR's attorneys' fees and the costs and disbursements incurred in the this action.

9. By reason of the foregoing, COR is entitled to the sum of eighty-five thousand dollars (\$85,000.00) with interest thereon and late charges from Defendant, together with COR's attorneys' fees and the costs and disbursements incurred in this action.

WHEREFORE, COR demands judgment against Defendant as follows:

- A. Damages in the amount of eighty-five thousand dollars (\$85,000.00) with interest thereon, together with contractual interest and late charges; and
- B. COR's attorney's fees incurred in this action, along with the costs and disbursements incurred in this action; and
- C. Such other and further relief that this Court may deem just and proper.

Dated: August 8, 2016
Syracuse, New York



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